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*Representing the United States of America*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUSTIN DAVIS,

Defendant.

Case No.: 2:16-cr-00326-LRH-CWH

**Stipulation for Protective Order**

IT IS HEREBY STIPULATED AND AGREED between the parties, Steven W. Myhre, Acting United States Attorney for the District of Nevada, Jared L. Grimmer, Assistant United States Attorney, and Brian Pugh, Assistant Federal Public Defender, counsel for defendant JUSTIN DAVIS, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, driver's license numbers, dates of birth, or addresses, of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents."

The parties stipulate as follows:

1           1.       Protected Documents which will be used by the government in its case in chief  
2 include personal identifiers, including social security numbers, driver's license numbers, dates of  
3 birth, and addresses, of participants, witnesses, and victims in this case.

4           2.       Discovery in this case is voluminous. Many of the documents include personal  
5 identifiers. Redacting the personal identifiers of participants, witnesses, and victims would  
6 prevent the timely disclosure of discovery to defendants.

7           3.       The United States agrees to provide Protected Documents without redacting the  
8 personal identifiers of participants, witnesses, and victims.

9           4.       Access to Protected Documents will be restricted to persons authorized by the  
10 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,  
11 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

12          5.       The following restrictions will be placed on defendant, defendant's attorney and  
13 the above-designated individuals unless and until further ordered by the Court. Defendant,  
14 defendant's attorney and the above-designated individuals shall not:

15               a.       make copies for, or allow copies of any kind to be made by any other person  
16 of Protected Documents;

17               b.       allow any other person to read Protected Documents; and,

18               c.       use Protected Documents for any other purpose other than preparing to  
19 defend against the charges in the Indictment or any further indictment arising out of this case.

20          6.       Defendant's attorney(s) shall inform any person to whom disclosure may be made  
21 pursuant to this order of the existence and terms of this Court's order.

22          7.       The requested restrictions shall not restrict the use or introduction as evidence of  
23 discovery documents containing personal identifying information such as social security numbers,  
24 driver's license numbers, dates of birth, and addresses during the trial of this matter.

